

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

GESTURE TECHNOLOGY PARTNERS,  
LLC,

Plaintiff,

v.

LG ELECTRONICS INC., AND LG  
ELECTRONICS U.S.A., INC.,

Defendants.

Civil Action No. 6:21-cv-00123-ADA

**JURY TRIAL DEMANDED**

**CASE READINESS STATUS REPORT**

Plaintiff Gesture Technology Partners, LLC (“Plaintiff”) and Defendants LG Electronics Inc. (“LGE”), and LG Electronics U.S.A., Inc. (“LGE USA”) (collectively “Defendants”) hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILING AND EXTENSIONS**

Plaintiff’s Complaint was filed on February 4, 2021. There have been five extensions for a total of 126 days.

**RESPONSE TO THE COMPLAINT**

Defendant LGE filed its Answer (Dkt. No. 24) on July 7, 2021. Defendant LGE has not asserted any counterclaims for non-infringement. Defendants filed Defendant LG’s Opposed Motion to Transfer Venue (“Defendants’ Motion”) (Dkt. No. 23) on July 7, 2021.

**PENDING MOTIONS**

Defendant filed Defendants’ Motion on July 7, 2021. Plaintiff intends to seek venue and jurisdictional discovery pursuant to the Court’s Amended Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases signed July 8, 2021, in response to Defendant

LG's Opposed Motion to Transfer Venue. Venue and jurisdictional discovery will end on October 2, 2021, and Plaintiff's Response to Defendants' Motion will be due on October 16, 2021. Defendants' Reply will be due on October 30, 2021. Defendants' Motion is pending as of the date of the filing of the Case Readiness Status Report.

### **RELATED CASES IN THIS JUDICIAL DISTRICT**

The related cases in this judicial district are the following:

1. *Gesture Technology Partners, LLC v. Apple, Inc.*, Civil Action No. 6:21-cv-00121-ADA; and
2. *Gesture Technology Partners, LLC v. Lenovo Group Ltd., Lenovo (United States) Inc., and Motorola Mobility LLC*, Civil Action No. 6:21-cv-00122-ADA.

### **IPR, CBM, AND OTHER PGR FILINGS**

Apple Inc. has filed the following IPRs:

1. IPR2021-00920 on May 21, 2021, of Plaintiff-owned U.S. Patent No. 7,933,431;
  2. IPR2021-00921 on June 2, 2021, of Plaintiff-owned U.S. Patent No. 8,878,949;
  3. IPR2021-00922 on May 18, 2021, of Plaintiff-owned U.S. Patent No. 8,553,079;
- and
4. IPR2021-00923 on May 26, 2021, of Plaintiff-owned U.S. Patent No. 8,194,924.

Unified Patents, LLC has filed IPR2021-00917 on May 14, 2021, of Plaintiff-owned U.S. Patent No. 7,933,431. All the patents involved in the above referenced IPRs are asserted in this litigation.

### **NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff has not yet served Preliminary Infringement Contentions. Plaintiff has asserted four patents and intends to assert approximately 75 claims. The asserted patents are U.S. Patent

Nos. 7,933,431, 8,878,949, 8,553,079, and 8,194,924.

**APPOINTMENT OF TECHNICAL ADVISER**

The parties do not believe that the appointment of a Technical Adviser is necessary for this case.

**MEET AND CONFER STATUS**

Plaintiff and Defendants conducted a meet and confer conference. The parties have no pre-Markman issues to raise at the CMC.

Dated: July 9, 2021

Respectfully submitted,

By: /s/ Fred I. Williams

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*Counsel for Defendants LG Electronics Inc.  
and LG Electronics U.S.A., Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 9, 2021 the undersigned caused a copy of the foregoing document to be served on all counsel of record, via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Fred I. Williams  
Fred I. Williams

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendants and counsel for Gesture Technology Partners, LLC met and conferred, and all parties agree to filing the foregoing document as a joint notice.

/s/ Fred I. Williams  
Fred I. Williams